

# MOTION FOR JUDICIAL NOTICE AND MOTION TO DISMISS FOR LACK OF JURISDICTION

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IN THE GREENWOOD DISTRICT COURT  
SEBASTIAN COUNTY, ARKANSAS

|                          |   |                             |
|--------------------------|---|-----------------------------|
| STATE OF ARKANSAS        | ) |                             |
|                          | ) |                             |
| v.                       | ) | CASE NO: GWDC-ST-2025-02747 |
|                          | ) |                             |
| JONATHAN DANIEL CLEMENTS | ) |                             |

MOTION FOR JUDICIAL NOTICE AND MOTION TO DISMISS FOR LACK OF  
JURISDICTION

Comes now the Defendant, Jonathan Daniel Clements, Living Trustee of ECC-TRUST-JDC-005, appearing specially and not generally, and respectfully moves this Court to take Judicial Notice of the documents previously submitted and to Dismiss this action for lack of subject matter and personal jurisdiction.

1. Judicial Notice of Trust and Ecclesiastical Record:

Defendant requests this Court take judicial notice of the executed ecclesiastical trust documents, including ECC-TRUST-JDC-005, which were duly notarized and publicly lodged. These documents establish lawful ecclesiastical standing and invoke jurisdiction outside of this civil venue. The Court is required to take notice of any material fact not subject to reasonable dispute, including lawfully filed records under Arkansas Rules of Evidence 201.

2. Improper Jurisdiction:

Defendant asserts ecclesiastical jurisdiction as Living Trustee under the trust instrument. The Greenwood District Court lacks jurisdiction over ecclesiastical matters, trust declarations filed under divine authority, and private property held in lawful trust, not engaged in commercial activity. Any civil enforcement against the trustee without rebuttal of said record

constitutes fraud under color of law.

3. No Legal Standing or Injury:

The Plaintiff (State of Arkansas) has failed to establish proper standing or commercial nexus over the private trust vehicle or property therein. The matter does not fall under civil or criminal jurisdiction unless clear injury or harm is shown — which has not been alleged.

4. Procedural Defects:

The court docket fails to show that lawful notice or service was executed regarding any of the citations or the warrant now allegedly issued. Furthermore, digital court records have been made inaccessible to Defendant, violating rights under the 14th Amendment and Article 2 of the Arkansas Constitution.

WHEREFORE, the Defendant respectfully demands:

- That the Court take Judicial Notice of ECC-TRUST-JDC-005 and all filings therein,
- That the action be dismissed immediately for lack of jurisdiction,
- That no further citations or actions be taken under color of law,
- That all trust documentation be returned to the Living Trustee upon dismissal,
- That a certified copy of the order of dismissal be provided for the record.

Respectfully submitted,

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Jonathan Daniel Clements  
Living Trustee of ECC-TRUST-JDC-005  
Date: October 21, 2025